

LHE:GK/DL/JS  
F. # 2018R01401

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

BILL OF PARTICULARS

– against –

23-CR-146 (DG)

RACHEL CHERWITZ and  
NICOLE DAEDONE,

Defendants.

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The United States of America, by and through BREON PEACE, United States Attorney, for the Eastern District of New York, and Lauren H. Elbert, Gillian Kassner, Devon Lash and Jonathan Siegel, Assistant United States Attorneys, hereby files the following Bill of Particulars for Forfeiture of Property.

The above-captioned Indictment seeks the forfeiture of property pursuant to 18 U.S.C. § 1594(d) and 21 U.S.C. § 853(p). The United States hereby gives notice that, in addition to the property identified in the forfeiture allegation in the Indictment, charging a violation of 18 U.S.C. § 1594(b), the United States seeks forfeiture, pursuant to 18 U.S.C. § 1594(d), of all right, title and interest in the following assets:

- (i) Approximately one hundred twenty-two thousand four hundred seventeen dollars and fifty-two cents (\$122,417.52) seized from Wells Fargo account number 3708503986 held in the name of Nicole Daedone, and all proceeds traceable thereto;
- (ii) Approximately one million one hundred fifty-nine thousand six hundred fifty-six dollars and forty-seven cents (\$1,159,656.47) seized from Fidelity

account number NBJ-019298 held in the name of Nicole Daedone, and all proceeds traceable thereto; and

- (iii) Approximately seven hundred eighty-two thousand three-hundred fifty-nine dollars and no cents (\$782,359.00) seized from Fidelity account number NBJ-019265 held in the name of Nicole Daedone, and all proceeds traceable thereto.

as: (a) property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of a violation of 18 U.S.C. § 1594, and any property traceable to such property; and (b) property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense, or property traceable to such property.

The United States reserves the right to supplement or amend this Bill of Particulars.

Dated: Brooklyn, New York  
August 21, 2023

Respectfully submitted,

BREON PEACE  
United States Attorney

By:                     /s/                      
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